

Brian C. Brook (No. 050442013)  
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*Attorneys for Defendants  
Eric Inselberg and Inselberg Interactive*

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY**

FIRST DATA CORPORATION and  
FRANK BISIGNANO

Plaintiffs,

v.

ERIC INSELBERG and INSELBERG  
INTERACTIVE, LLC,

Defendants.

Civ. Action No. 2:15-cv-08301 (KM) (JBC)

**Motion Day: November 7, 2016**

**NOTICE OF PLAINTIFFS'  
MOTION FOR ATTORNEYS'  
FEES AND COSTS**

**Oral Argument Requested**

TO: Kevin H. Marino  
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*Attorneys for Plaintiffs,  
First Data Corporation and Frank Bisignano*

PLEASE TAKE NOTICE that, pursuant to 28 U.S.C. § 1927 and this Court's  
inherent authority, on November 7, 2016, at 9:00 a.m., or at such other time as the Court set

when counsel may be heard, Defendants Eric Inselberg and Inselberg Interactive, LLC, shall move before the Honorable Kevin McNulty, U.S.D.J., at the United States District Court, Frank R. Lautenberg U.S. Post Office & Courthouse, Courtroom 04, Newark, New Jersey 07102, for an Order awarding them attorneys' fees and costs incurred as a result of Plaintiffs' bad faith institution and pursuit of this litigation.

PLEASE TAKE FURTHER NOTICE that in support thereof, Defendants shall rely on the accompanying Memorandum of Law and Declaration of Brian C. Brook.

PLEASE TAKE FURTHER NOTICE that Defendants hereby respectfully request oral argument. A proposed form of order is submitted herewith.

Dated: September 27, 2016

/s/ Brian C. Brook  
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